

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

NATHAN BROWN,)	
)	
Plaintiff,)	
)	Case No: CIV-24-959-SLP
v.)	Judge Scott Palk
)	
ENCOMPASS INSURANCE COMPANY)	
OF AMERICA,)	
)	
Defendant.)	

**JOINT MOTION TO CONTINUE SCHEDULING DEADLINES AND ENTER
PROPOSED SCHEDULING ORDER**

The Parties hereby move this Court to continue **all** Scheduling Deadlines and enter the attached Proposed Amended Scheduling Order. In support of this Motion, the parties show this Court as follows:

1. This Court entered a Scheduling Order on October 28, 2024.
2. This matter is set on the trial docket for August 2025.
3. At the time of this filing, there are several Scheduling Order Deadlines quickly approaching, namely the mediation deadline that is set for March 3, 2025, for which additional discovery is needed.
4. Counsel are in agreement that the current deadlines should be continued to allow for full and complete discovery.
5. All parties agree with this Motion.

6. In light of these factors, additional time is necessary to complete discovery, including party, witness and expert deposition. The parties agree that a ninety (90) day continuance of all deadlines set by the current Scheduling Order is warranted.

7. An agreed Amended Scheduling Order is attached to this Joint Motion for the Court's review and approval.

8. WHEREFORE, the parties respectfully move this Court to enter an Order continuing the Scheduling Order Deadlines as proposed in the attached Amended Scheduling Order.¹

Respectfully submitted,

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¹ The trial date is left blank to allow the Court to place this matter on the appropriate trial docket.

NATHAN BROWN,

Plaintiff,

VS.

ENCOMPASS INSURANCE COMPANY OF AMERICA,
Defendant.

Case No. CIV-24-959-SLP

August, 2025 TRIAL DOCKET

AMENDED SCHEDULING ORDER

Before this is the Parties' Motion to Extend Deadlines. For good cause shown, the Motion is hereby GRANTED. The Deadlines in this matter are HEREBY reset to the corresponding dates outlined below:

Jury Trial Demanded X

Non-Jury Trial _____

THE FOLLOWING DEADLINES ARE SET BY THE COURT

1. Motions to join additional parties to be filed
Within 30 days of this Order.
 2. Motions to amend pleadings to be filed within
30 days of this Order.
 3. (a) Plaintiff to file a final list of expert
witness(es) in chief and submit expert reports to
defendant by 7-30-25 .*
 - (b) Defendant to file a final list of expert
witness(es) in chief and submit expert reports to
plaintiff by 14 days thereafter .*
 4. (a) Plaintiff to file a final list of witnesses,
together with addresses and brief summary of
expected testimony where a witness has not
already been deposed by 7-30-25 .*
 - (b) Defendant to file a final list of witnesses (as
described above) 14 days thereafter.*
 5. (a) Plaintiff to file a final exhibit list by:
7-30-25 .* Defendant
to file objections to Plaintiff's final exhibit list,
under Fed. R. Civ. P. 26(a)(3)(B), by 14 days
thereafter .
 - (b) Defendant to file a final exhibit list by
8-20-25 .* Plaintiff to file objections to
Defendant's final exhibit list, under Fed. R.
Civ. P. 26(a)(3)(B), by 14 days thereafter .
 - *The listing of witnesses and exhibits shall
separately state those expected to be called
or used and those which may be called or
used if the need arises. Except for good
cause shown, no witness will be permitted to
testify and no exhibit will be admitted in any
party's case in chief unless such witness or
exhibit was included in the party's filed
witness or exhibit list.
 6. Discovery to be completed by 9-29-25 .
 7. All dispositive and *Daubert* motions to be filed
by 8-31-25 .
If the deadline for dispositive motions and
Daubert motions precedes the discovery
deadline, the parties are expected to conduct any
discovery necessary for such motions in advance
of the motion deadline.
 8. Trial docket _____**
**Trial dockets generally begin the second
TUESDAY of each month; however, this
practice varies, particularly during holidays.
The published trial docket will announce the
trial setting.
The interval between the dispositive motion
deadline (¶ 7) and the trial docket (¶ 8) is
relatively inflexible. An extension of time to file
or respond to a motion for summary judgment
will likely affect the trial setting.
 9. Designations of deposition testimony to be used
at trial to be filed by 9-29-25 . Objections and
counter-designations to be filed by
10-6-25 .****Parties objecting to
use of deposition testimony must submit with their
objections, the relevant portions of the deposition
transcript with specific testimony highlighted.****

10. Motions in limine to be filed by 9-29-25
******Unless leave of Court to file separate motions in limine is granted, all motions in limine shall be consolidated into a single filing, which shall be subject to the page limitation in LCvR 7.1(d).******
11. Requested voir dire to be filed by 9-29-25.
12. Trial briefs (optional unless otherwise ordered) to be filed by 9-29-25.
13. Requested jury instructions to be filed on or before 9-29-25.***
14. NON-JURY CASES ONLY: Proposed findings and conclusions of law to be filed no later than _____.***
*****In addition to filing, the parties are encouraged, but not required, to submit their proposed jury instructions or findings of fact and conclusions of law in Word format to the Clerk via the Court's designated mail box: palk-orders@okwd.uscourts.gov**
15. Any objection or responses to the trial submissions referenced in 10, 11, 12, 13, or 14 to be filed within seven (7) days thereafter. Replies, if warranted, to be filed within three (3) days.
16. Proposed final pretrial report, approved by all counsel, **and in full compliance** with Local Rules (see Appendix IV), together with a proposed order approving the report, to be submitted to the Court by 7-1-25.
17. This case is referred to the following Court-sponsored ADR/settlement process or special trial track:
- X by agreement of the parties, with the approval of the Court:
 by Order of the Court:
- X Mediation
 Judicial Settlement Conference
 Other _____
- If the case is referred to mediation or some other form of private ADR, the process shall be completed and a report filed with the Court by the parties, stating whether the case settled, not later than 6-1-25.
18. _____ The parties consent to trial by a Magistrate Judge.
19. Initial disclosure pursuant to Fed. R. Civ. P. 26 has been made _____; is excused _____; or shall be made no later than _____.
20. Other:

DATED this _____ day of _____, 2025.

BY ORDER OF THE COURT
 JOAN KANE, CLERK

By s/_____